

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

Hon. George Caram Steeh  
Case No.: 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

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MILLER COHEN, P.L.C.  
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**STIPULATION AND PROTECTIVE ORDER REGARDING  
DEFENDANT'S RESPONSE TO PLAINTIFF'S THIRD SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS, REQUEST NO.1**

Defendant will produce to the Plaintiff documents pertaining to discipline issued to employees referenced in response to Plaintiff's Third Set of Requests for Production, Request No. 1 ("Responsive Documents"), whether or not such documents are contained in personnel files, such as any written complaints, written records of discipline, and other written records created in the course of Defendant's investigation of whether the employee violated the policies and its justification of

any discipline imposed. This production will be made under the following protective conditions:

1. For purposes of this agreement, Responsive Documents will be used only in this action and for no other purposes. The information shall be marked "Confidential-Subject to Protective Order" and will be treated as confidential documents. Such designation will make the documents and all copies, prints, summaries, excerpts, or other reproductions of such documents subject to this order.
2. Responsive Documents will not, without leave of the court, be communicated in any way to anyone other than 1) this court under seal; 2) the jury; 3) counsel for the parties in this action and their paralegal and clerical assistants who have a need for these documents in connection with these actions; 4) non-attorney persons retained by a party or outside counsel to serve as expert witnesses or otherwise to provide advice to counsel in connection with this action; 5) deponents and witnesses at trial; 6) the parties; and, 7) their employees, to the extent that involvement with this action is part of their job duties.
3. This stipulation and order, insofar as it restricts the communication and use of the Responsive Documents, and testimony regarding Responsive Documents, must continue to be binding throughout and after the conclusion of this action, including all appeals.
4. This stipulation and protective order will become effective on its execution by the undersigned counsel for the parties notwithstanding the date the court enters the stipulation and protective order.

IT IS SO ORDERED:

s/George Caram Steeh  
U. S. District Judge

Dated: March 30, 2015

Agreed to by:

/s/Keith D. Flynn

Keith D. Flynn (P74192)

*Attorney for Plaintiff*

/s/Terrence J. Miglio (w/consent)

Terrence J. Miglio (P30541)

Barbara E. Buchanan (P55084)

*Attorneys for Defendant*

Dated: March 27, 2015

Dated: March 27, 2015